

Declaration of New York Immigration Coalition (NYIC)

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

New York Immigration Coalition, et
al.,

Plaintiffs

v.

DONALD J. TRUMP, President of
the United States, in his official
capacity, et al.,

Defendants

CIVIL ACTION NO: 25-cv-1309

**DECLARATION OF MURAD AWAWDEH, PRESIDENT AND CEO OF
NEW YORK IMMIGRATION COALITION (“NYIC”)**

I, Murad Awawdeh, upon my personal knowledge, hereby submit this
declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am more than 18 years of age and competent to testify, upon personal knowledge, to the facts set forth herein.
2. I am the President and CEO of the New York Immigration Coalition (“NYIC”). I was appointed to this role by the NYIC’s Board of Directors in April 2021.
3. I have been affiliated with the NYIC for over a decade. Most of my career has been dedicated to fighting for low-income communities of color across the State

of New York. I have organized immigrant communities to stop dangerous and hazardous developments in Sunset Park, Brooklyn, and engaged community residents to build power and bring transformational change to their neighborhoods.

4. As the President and CEO of the NYIC, I oversee the organization's programming, including the NYIC's services provided to individuals and NYIC's membership.

Background on the NYIC

5. The NYIC is a 37-year-old tax-exempt nonprofit organization headquartered in New York, New York. It has offices in Albany, Buffalo, Hempstead, Newburg, Rochester, and Syracuse.

6. The NYIC is a statewide member-led coalition comprised of over 170 immigrant and refugee organizations. Its mission is to strengthen and build its members' power, organize and educate its communities and the public, and use its members' collective voice to advocate for opportunity and justice. The NYIC's membership includes immigrant-led and immigrant-serving groups. These organizations pay a membership fee based off of their organizational budget. The NYIC also directly serves immigrants on an as-needed basis.

7. The NYIC leads and/or participates in coalition-based local, state, and federal advocacy and integration campaigns, provides immigration-serving

organizations with capacity-building support, and engages in community outreach and education, service coordination, and direct legal services.

8. Among other services the NYIC offers to immigrants, it provides free immigration legal services assistance. In 2024, the NYIC assisted over 400 immigrants for petitions for asylum, Temporary Protected Status (“TPS”), work permits, and Motions to Reopen immigration cases.

The Impact of the Birthright Citizenship Ban

9. Executive Order 14160 (“the birthright citizenship ban”) has a direct impact on both noncitizens that NYIC serves and on members of its constituent organizations. The NYIC and its member organizations have served more than twenty expectant parents whose statuses are targeted by the birthright citizenship ban and thus harmed by the ban. The NYIC is also aware that at least two of its member organizations have members who are expectant mothers and fathers without permanent immigration status and thus harmed by the ban.

10. M.B.M. is seven months pregnant with her first child, who is due May 2025. M.B.M is a 26-year-old Venezuela national with a pending asylum application. The father of her child, who is also Venezuelan, has Temporary Protected Status through April 2025. M.B.M. receives prenatal care through Medicaid. She is worried that her U.S.-born child will be denied postnatal care, denied a social

security card, and subjected to discrimination if the birthright citizenship ban goes into effect.

11. O.M. is four months pregnant. She and her partner, M.M., are expecting their first U.S.-born child in August 2025. O.M. and her partner fled violence in their home country with their children. They have Temporary Protected Status. They are very concerned that their U.S.-born child will be denied United States citizenship which would expose the child to discrimination.

12. In addition to serving impacted expectant parents, the NYIC has been combating the climate of fear, persecution and anxiety engendered by policies targeting immigrant communities, including the birthright citizenship ban. For example, the NYIC's Organizing & Strategy team has coordinated at least twelve events, such as town halls and mobilizations, at times in collaboration with Legal and Policy. Its Community Engagement team has delivered at least seventy Know Your Rights sessions in direct response to new federal policies. Its Policy team has also delivered at least four briefings open to all of the NYIC's member organizations on changes to federal immigration law and policies.

13. Immigrant communities have fears of bringing their children to school, enrolling them in a bilingual school, going to church and hospitals, and of traveling interstate. The NYIC is engaged in Family Preparedness sessions to help families plan for the care of their children should a parent be deported or

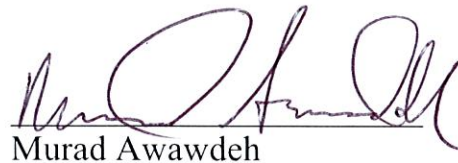
detained. The U.S.-born children of the NYIC's constituents will face these same fears and anxieties if the birthright citizenship ban is not enjoined.

14. The birthright citizenship ban deprives members of the NYIC's constituent organizations of the right to identify as United States citizenship, to live without fear of deportation, to access benefits provided to United States citizens, and when they are older, the right to vote, to work, and to participate fully in civic life.

15. I provide this declaration in support of Plaintiffs' motion for a preliminary injunction to enjoin enforcement and implementation of the Executive Order banning birthright citizenship.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 20, 2025


Murad Awawdeh